

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JACOB BRAMAN,

Plaintiff,

vs.

DB INDUSTRIES, LLC d/b/a CAPITAL  
SAFETY USA,

Defendants,

Case No.: 2:16-CV-13897-VAR-MKM

Hon. Victoria A. Roberts

Maj. Mona K. Majzoub

(Removed from Wayne County  
Circuit Court, Case No. 16-009464)

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**WITNESS LIST ON BEHALF OF DEFENDANT**  
**DB INDUSTRIES, LLC D/B/A CAPITAL SAFETY USA**

NOW COMES Defendant, DB INDUSTRIES, LLC d/b/a CAPITAL

SAFETY USA, by and through its attorneys, FOLEY, BARON, METZGER & JUIP, PLLC and BLACKWELL BURKE, for its Witness List, states as follows:

1. Plaintiff Jacob Braman, 1405 Bishop Road, Grosse Pointe, MI 48230;
2. Dave Schlangen, DB Industries d/b/a Capital Safety USA, 3833 Sala Way, Red Wing, MN 55066
3. Robert D. Caligiuri, Ph.D., P.E., FASM, Exponent, 149 Commonwealth Drive, Menlo Park, California 94025 (expert witness-Materials Engineering)
4. Nigel Ellis, Ph.D., CSP, P.E., CPE, Ellis Fall Safety Solutions, LLC, 306 Country Club Drive, Wilmington, DE 19803-2920 (expert witness-Fall Protection Equipment and Training)
5. Stephen L. Young, Ph.D., CPE, Applied Safety, 3909 Research Park Drive, Suite 300, Ann Arbor, Michigan 48108 (expert witness-Human Factors)
6. Rebecca Wozniak, R.N., BSN, CCM, CNLP, 3818 Red Root Rd., Lake Orion, MI 48360 (expert witness—Life Care Planner)
7. Christopher L. Bartlett, Ph.D., 8505 Freeport Parkway, Irving, Texas 75063 (expert witness—Economist)
8. Any and all eye witnesses to the alleged incident including, but not limited to, Cody Lewis (K2COM Services Employee);
9. Employees and representatives of General Dynamics including, but not limited to, Robert Seidel, Quality and EMS Director, Brooks Keel, Safety Manager for the East Region, Josh Johnson, and Rachel Fitzgerald;
10. Employees and representatives of Apeiron International, Mr. Braman's employer;

11. Employees and representatives of American Tower, the owner of the subject tower;
12. Any and all Plaintiff's treating and/or examining physicians, physician's assistants, nurse practitioners, and/or medical providers;
13. Records custodian/representative of any and all health care providers of Mr. Braman;
14. Custodians of records required to authenticate any exhibits or records for trial;
15. Any and all witnesses listed in any other parties' Witness Lists;
16. Any and all witnesses appropriate to rebut any testimony or other evidence offered at trial; and
17. Any and all witnesses whose identities are learned in the course of and investigation in this matter.

This Defendant reserves the right to call upon any professional witness identified and call upon them to render opinion testimony. This Defendant specifically reserves the right to amend and add to this witness list the names of further witnesses, including experts, as it deems necessary to its defense based upon the subsequent identification and/or disclosure of witnesses, response to interrogatories by Plaintiffs regarding expert witnesses or information and by way of further discovery in this matter, particularly as plaintiffs have yet to provide all subsequent treatment records.

FOLEY, BARON, METZGER & JUIP, PLLC

By: /s/ **Saulius D. Polteraitis**

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*Attorneys for Defendant DB Industries*

DATED: March 31, 2017

**PROOF OF SERVICE**

The undersigned certifies that a copy of the foregoing instrument was served upon counsel of record via USDC E-file system on March 31, 2017. I declare under penalty of perjury that the statement above is true to the best of my knowledge, information and belief.

By: /s/Robin M. Flores